

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

—*against*—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”;

THEIA AVIATION, LLC; and

THEIA HOLDINGS A, INC., d/b/a “THORIAN
HOLDINGS,”

Defendants.

21 Civ. 6995

DECLARATION OF CHARLES MICHAEL

1. I am a partner with Steptoe & Johnson LLP, counsel for plaintiff FCS Advisors, LLC (“FCS”). I submit this declaration in support of FCS’s motion to appoint a temporary receiver and for expedited discovery.

2. Attached are true copies of the following exhibits:

Ex.	Document
A	Complaint, <i>Theia Technologies LLC v. Theia Group, Inc. and Theia Holdings A, Inc.</i> , ECF 1, Case No. 2:20-cv-00097-GEKP (E.D. Pa. Jan. 6, 2020)
B	Defendants’ Final Pretrial Memorandum, <i>Theia Technologies LLC v. Theia Group, Inc. and Theia Holdings A, Inc.</i> , ECF 179, Case No. 2:20-cv-00097-GEKP (E.D. Pa. June 23, 2021)
C	Printout from Delaware Secretary of State Website (https://icis.corp.delaware.gov/eCorp/) showing corporate filings of Theia Group, Inc., Theia Aviation, LLC, and Theia Holdings A, Inc., August 2, 2021
D	Certificate of Incorporation, Thorian Group Incorporated, filed June 4, 2021
E	Certificate of Incorporation, Thorian Holdings A Incorporated, filed July 26, 2021
F	Certificate of Incorporation, Cypherian Corp., filed April 20, 2021, and Certificate of Conversion from Cypherian Corp. to Cypherian LLC, filed May 24, 2021
G	[Proposed] Expedited First Document Requests and Interrogatories to Defendants, dated August 19, 2021

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 19, 2021

/s/ Charles Michael

Charles Michael